From: Rand Crafts
To: Milka Radulovic
Date: Tuesday, September 25, 2001 2:01:07 PM
Subject: Re: IPSC Dense Pack AO Drafts

Milka,

Thank you for the draft. We have just discussed a couple of things internally and one issue came up. It will be a couple of years before the uprate project actually uprates the units. The first dense pack turbine upgrade will install in the Spring (2002), but IPP will not be increasing fuel use at that time, due to bottlenecks in output from other points, which will be corrected later in the project. So I've been instructed to ask the question of phasing the AO, as was originally discussed in April. My thought would be something like a dual limit in Condition 9. For instance, is it possible to have the 0.50 limit for NOx and the 0.15 limit for SO2 remain as long as the heat input capability remains 8500? Then at any time IPP can handle any amount of increased heat input, the new limits would kick in? One way to put this could be as follows:

Limitations and Tests Procedures

9. Emissions to the atmosphere at all times from the indicated emission points shall not exceed the following rates and concentrations:

Each Main Boiler (While rated at 8,500 x 106 Btu/hr)

Pollutant		lb/ 106 Btu heat input
PM10	0.020	lb/ 106 Btu heat input
SO2	0.1415	lb/ 106 Btu heat input based on 30-day rolling-average
10.0 % of the potential combustion concentration		
NOx	0.47	lb/ 106 Btu heat input based on 30-day rolling-average

AND

Limitations and Tests Procedures

9. Emissions to the atmosphere at all times from the indicated emission points shall not exceed the following rates and concentrations:

Each Main Boiler (When rated at 9,225 x 106 Btu/hr)

Pollutant		lb/ 106 Btu heat input
PM10	0.020	lb/ 106 Btu heat input
SO2	0.1415	lb/ 106 Btu heat input based on 30-day rolling-average
10.0 % of the potential combustion concentration		
NOx	0.47	lb/ 106 Btu heat input based on 30-day rolling-average

For this to occur, of course, IPSC would have to keep the DAQ apprised of the construction process, and once increased output could be accommodated, the new limits would kick in. The DAQ could require this via official letter or something similar. The biggest reason for this is that some people still have a nagging feeling that budget constraints could hit anytime, effectively killing the upgrade for one or both units.

Your thoughts?